

**UNITED STATES DISTRICT COURT**  
for the  
District of New Mexico



United States of America  
v.  
Jerry L. Pearson (YOB 1972)

Case No. **23 MJ 1330**

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 24, 2023 in the county of San Juan in the  
\_\_\_\_\_  
District of New Mexico, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1) and 924

*Offense Description*  
Felon in Possession of a Firearm and Ammunition

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

  
\_\_\_\_\_  
*Complainant's signature*

Jacob Courtney - ATF Task Force Officer  
\_\_\_\_\_  
*Printed name and title*

Telephonically sworn and electronically signed.

Date: August 24, 2023

  
\_\_\_\_\_  
*Judge's signature*

City and state: Farmington, New Mexico

Hon. B. Paul Briones, U.S. Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

Criminal Complaint - Continued.

United States of America

V.

Jerry PEARSON

SSN: 4232

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**AFFIDAVIT**

I, Jacob C. Courtney, a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), being duly sworn, depose and state:

1. I make this affidavit in support of the arrest of JERRY LEE PEARSON (year of birth 1972, social security number XXX-XX-4232) (hereafter "PEARSON"), for a violation of 18 U.S.C. §§ 922(g)(1) and 924, Felon in Possession of a Firearm and Ammunition.
2. I have worked as a TFO since February 2020. I am currently assigned to the Albuquerque Field Office Task Force of the ATF and have primary investigative responsibility for violent crimes occurring within San Juan County, New Mexico dealing with violent offenders, crimes involving firearms, and individuals with prior felony convictions. As a TFO, I am charged with enforcing criminal laws, including violations of 18 U.S.C. §§ 922(g) and 924, and I am authorized by law to request an arrest warrant.
3. I am currently assigned to the San Juan County Sheriff's Office Detective Division. I have received training in criminal investigation and prosecution in the San Juan County Criminal Justice Training Authority. I have conducted and participated in numerous investigations involving a range of misdemeanor and felony crimes which have resulted in seizures, arrests, and prosecutions of criminal offenders. I have received extensive training and experience in investigations. I have received additional training in homicide and death investigations, child death investigations, arson investigations, interviewing techniques, and others in my tenure as a detective. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.
4. I am a member of the Fire and Explosion Task Force in San Juan County which is comprised of another San Juan County Detective and multiple Fire Investigators. I have specific training in residential arsons, vehicle arsons, and explosive reconstruction training.
5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

6. On August 18, 2023, I obtained a federal search warrant for PEARSON'S residence, 2401 Catalina Court in Farmington, New Mexico (San Juan County). The search warrant permitted the search of PEARSON's residence for firearms and ammunition, to including machine gun conversion devices and silencers. PEARSON has a felony conviction from 2002 in Maricopa County, Arizona, for misconduct involving weapons/possession by a prohibited person, an Arizona class 4 felony. Therefore,

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PEARSON is not allowed to possess firearms and his possession of any firearm, machine gun conversion devices, and/or silencers would be in violation of federal law, including 18 U.S.C. §§ 922(g) and (o).

7. The search warrant was executed on August 24, 2023. Prior to the search warrant being executed, PEARSON left the residence in a gray Dodge, dual rear wheel pickup. A traffic stop was conducted to detain PEARSON for purposes of the search warrant. PEARSON was alone in the vehicle and was advised of his rights. PEARSON then admitted to having a "1911" pistol in the vehicle with him. ATF TFO V. Hernandez spoke with PEARSON and was given consent to grab the backpack from the vehicle PEARSON was driving. Two 1911 pistols were located in the backpack, as well as seven (7) loaded 1911 pistol magazines. A plate carrier vest was also located inside the vehicle, which PEARSON stated he uses for protection.
8. Inside the residence, law enforcement agents found approximately 33 firearms, 7 NFA devices, hundreds of rounds of ammunition, apparent silencers, component parts consistent with manufacturing silencers, and one apparent machine gun conversion device. Further analysis on these items remains pending.
9. I researched one of the 1911 pistols seized from the vehicle and found it was not manufactured in the State of New Mexico, therefore affecting interstate commerce. The pistol is a Rock Island Armory 1911, .45 caliber pistol with serial number RIA1937320. This firearm also meets the federal definition of "firearm," pursuant to 18 U.S.C. § 921(a)(3). Full analysis on the remaining firearms is pending.
10. I interviewed PEARSON and confirmed he had been advised of his rights and he understood them. He agreed to speak with me. PEARSON stated only he and his wife live in the residence at 2401 Catalina Court. When asked how many firearms he owns in the residence, he stated approximately "20." PEARSON also admitted to buying a pistol with a Glock "Switch" on it from an unknown person. When asked where this Glock "switch" was, PEARSON stated it was in his nightstand near his bed. PEARSON also admitted to being a felon and knowing he was convicted in the state of Arizona.
11. Based upon these facts, I believe that there is probable cause to believe that Jerry PEARSON has committed the crime of felon in possession of a firearm and ammunition, in violation of 18 U.S.C. §§ 922(g)(1) and 924.
12. Assistant United States Attorney Sarah Mease has reviewed and approved this complaint.

Criminal Complaint - Continued.

United States of America

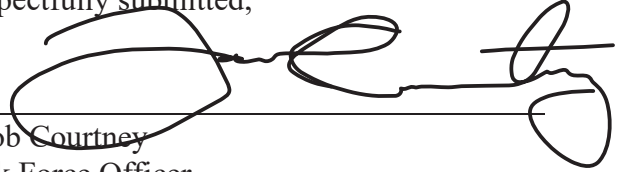
V.

Jerry PEARSON

SSN: 4232

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jacob Courtney", written over a horizontal line.

Jacob Courtney  
Task Force Officer  
ATF

Subscribed and sworn to me by  
reliable electronic means on August 24, 2023:

A handwritten signature in black ink, appearing to read "B. Paul Briones", written over a horizontal line.

HONORABLE B. PAUL BRIONES  
UNITED STATES MAGISTRATE JUDGE